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May 18, 2020

Nick Mueller, Esq.
Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: MUR 7180

Dear Mr. Mueller,

We are in receipt of the General Counsel's Brief in MUR 7180 and Ms. Stevenson's accompanying letter dated May 15, 2020.

We respectfully request a 60-day extension of time to file a reply brief, or until Wednesday, July 29, 2020. The General Counsel's Brief is 24 pages in length, raises a host of complex factual and legal issues, and employs a legal analysis under which the Commission has not previously found liability. This extension is necessary due to the nature of the issues presented and conclusions reached coupled with ongoing difficulties presented by current mandated office closures. Furthermore, the Commission currently lacks a quorum of Commissioners and is unable to consider the matter at this time.

Our client will agree to an appropriate tolling agreement in connection with this extension request.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Jason Torchinsky', written over a light blue horizontal line.

Jason Torchinsky
Michael Bayes
Counsel to GEO Corrections Holdings, Inc.

cc: Chair Caroline C. Hunter
Vice Chairman Steven T. Walther
Acting General Counsel Lisa J. Stevenson